

**WILLKIE FARR & GALLAGHER LLP**

Koren Bell (SBN 268614)  
kbell@willkie.com  
2029 Century Park East  
Los Angeles, CA 90067  
T: 310-855-3016  
F: 310-855-3099

Michael S. Schachter (*Pro Hac Vice*)  
Steven J. Ballew (*Pro Hac Vice*)  
mschachter@willkie.com  
sballew@willkie.com  
787 Seventh Avenue  
New York, NY 10019-6099  
T: 212-728-8102  
F: 212-728-9102

Attorneys for Defendant  
RUTHIA HE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUTHIA HE, A/K/A RUJIA HE, and  
DAVID BRODY,

Defendants.

CASE NO. 3:24-cr-00329-CRB

**DEFENDANT RUTHIA HE'S  
MOTION FOR AN ORDER SETTING A  
POST-TRIAL MOTION BRIEFING  
SCHEDULE**

Defendant Ruthia He, by and through her undersigned counsel, respectfully requests the Court to set a briefing schedule for any post-trial motions Defendants may file pursuant to Federal Rules of Criminal Procedure 29 and 33 as set forth in the accompanying Proposed Order. Pursuant to the Court's request that the parties confer about a briefing schedule for any post-trial motions, the defense proposed dates to the Government last Friday, November 21. The defense has yet to hear back from the Government on its position. The defense therefore requests that the Court order the following briefing schedule for any post-trial motions Defendants may file:

1. Defendants shall file any motions and supporting briefs by **January 12, 2026;**
2. The Government shall file any oppositions to Defendants' motions by **January 26, 2026;** and
3. Defendants shall file any reply briefs in further support of their motions by **February 2, 2026.**

WILLKIE FARR & GALLAGHER LLP

By: /s/ Koren Bell  
 Koren Bell  
 Michael S. Schachter  
 Steven J. Ballew

*Attorneys for Defendant*  
 RUTHIA HE